

THE OFFICE OF REGULATORY STAFF

DIRECT TESTIMONY

OF

MICHAEL SEAMAN-HUYNH

SEPTEMBER 5, 2017



Docket No. 2017-221-E

**Application of South Carolina Electric & Gas Company for a
Certificate of Environmental Compatibility and Public
Convenience and Necessity for the Construction and
Operation of the Graniteville-South Augusta 230kV Tie Line
and Urquhart-Graniteville #2 230 kV Tie Line and
Associated Facilities**

DIRECT TESTIMONY OF
MICHAEL L. SEAMAN-HUYNH
ON BEHALF OF
THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF
DOCKET NO. 2017-221-E
IN RE: APPLICATION OF SOUTH CAROLINA ELECTRIC & GAS COMPANY FOR
A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC
CONVIENCE AND NECESSITY FOR THE CONSTRUCTION AND OPERATION OF
THE GRANITEVILLE-SOUTH AUGUSTA 230 KV TIE LINE AND URQUHART-
GRANITEVILLE #2 230 KV TIE LINE AND ASSOCIATED FACILITIES

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.

A. My name is Michael Seaman-Huynh. My business address is 1401 Main Street, Suite 900, Columbia, South Carolina 29201. I am employed by the State of South Carolina as a Senior Regulatory Manager in the Utility Rates and Services Division of the Office of Regulatory Staff ("ORS").

Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A. I received my Bachelor's Degree from the University of South Carolina in 1997. Prior to my employment with ORS, I was employed as an energy analyst with a private consulting firm. I joined ORS in 2006 as an Electric Utilities Specialist and was promoted to Senior Electric Utilities Specialist in 2010. When the Energy Regulation Department was formed in August 2015, I assumed the position of Senior Regulatory Analyst. In May

2016, the Utility Rates and Services Division was formed, and I was promoted to the position of Senior Regulatory Manager.

Q. HAVE YOU TESTIFIED BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA (“COMMISSION”)?

A. Yes. I have testified on numerous occasions before the Commission in connection with hearings concerning fuel clauses, general rate cases, and S.C. Code Ann. § 58-33-10 to 170, Utility Facility Siting and Environmental Protection Act (“Siting Act”) proceedings.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to provide the results of ORS’s review of the Revised Application (“Application”) of South Carolina Electric & Gas Company (“SCE&G” or “Company”) for a Certificate of Environmental Compatibility and Public Convenience and Necessity (“Certificate”) filed on August 22, 2017 to construct and operate two (2) 230 kilovolt (“kV”) transmission lines (“Proposed Lines”) and associated facilities, traversing approximately eighteen (18) miles in Aiken County in South Carolina. The Application was filed pursuant to the Siting Act and 10 S.C. Code Ann. Regs. 103-304.

Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PROPOSED TRANSMISSION FACILITIES.

A. The first of the proposed facilities is a 230 kV transmission line extending approximately 18.1 miles in Aiken County from a Southern Company owned transmission structure, located near the Savannah River in South Carolina, to the Company’s Graniteville Substation No. 2 (“Graniteville #2-South Augusta 230 kV Tie Line”). The

1 proposed line would be built on existing Company right-of-way ("ROW") except for an
2 approximately 0.46 mile segment, which is located on property within the Company's
3 Urquhart Generating Station Site.

4 The second of the proposed facilities is a 230 kV transmission line extending
5 approximately 17.6 miles from the Company's Urquhart Substation to the Company's
6 Graniteville Substation No. 1 ("Urquhart-Graniteville 230 kV Line"). The proposed line
7 would be built on existing Company ROW in Aiken County.

8 The Company's Application also includes a 230 kV line terminal and a 230 kV
9 power circuit breaker at the Company's Graniteville Substation No. 1. Both are necessary
10 to support the Urquhart-Graniteville 230 kV Line.

11 **Q. WHAT IS YOUR UNDERSTANDING OF THE NEED FOR THE PROPOSED**
12 **LINES AND ASSOCIATED FACILITIES?**

13 **A.** The Company's Transmission Planning studies indicate heavy electrical loading
14 will result on a key 230 kV line connecting SCE&G and Southern Company (Vogtle-
15 Savannah River Site 230 kV Tie Line). This heavy electrical loading, which may occur as
16 early as 2019, has the potential to cause power disruptions throughout the Company's
17 service territory.

18 The Company adheres to the North American Electric Reliability Corporation's
19 ("NERC") Transmission Planning Standards, as well as its own Long Term Planning
20 Criteria, to determine the need for new transmission facilities. By applying these standards
21 and criteria to the electrical system, the Company determined additional support was
22 necessary, and the Proposed Lines were the most appropriate solution. The Proposed Lines

1 will ensure that the Company's system remains in compliance with NERC standards and
2 its own Long Term Planning Criteria.

3 **Q. ARE THE PROPOSED LINES IMPACTED BY THE POTENTIAL**
4 **CANCELLATION OF CONSTRUCTION AT V.C. SUMMER UNITS #2 AND #3?**

5 **A.** No. The Company has indicated the cancellation of V.C. Summer Units #2 and #3
6 would not impact the need for the Proposed Lines, the projected costs or construction
7 schedule.

8 **Q. DID THE COMPANY CONSIDER ANY ALTERNATIVES TO CONSTRUCTING**
9 **THE PROPOSED TRANSMISSION FACILITIES?**

10 **A.** Yes. The Company and Southern Company jointly considered alternatives to the
11 Proposed Lines. These alternatives included construction of new transmission lines and/or
12 installing line reactors on different existing transmission lines. Ultimately, the Company
13 and Southern Company determined these alternatives were either not feasible due to time
14 constraints or led to negative impacts for other facilities.

15 **Q. PLEASE DESCRIBE THE INFORMATION THE SITING ACT REQUIRES IN AN**
16 **APPLICATION FOR A CERTIFICATE.**

17 **A.** The Siting Act directs that an application contain a description of the location and
18 the major utility facility(ies) to be built; a summary of any studies which have been made
19 of the environmental impact of the facility(ies); a statement explaining the need for the
20 facility(ies); and such other information as the applicant may consider relevant or as the
21 Commission may require.

22 **Q. DOES THE APPLICATION CONTAIN THIS INFORMATION?**

1 **A.** Yes. A description of the facilities and their locations is presented, as well as siting
2 and environmental reports including a description of the intended use and need for the
3 facilities.

4 **Q. WHAT IS THE PROBABLE ENVIRONMENTAL IMPACT OF THE**
5 **TRANSMISSION LINES?**

6 **A.** The Company conducted a Siting and Environmental Report (“Study”) to
7 determine the environmental impact of the Proposed Lines. The Study takes into
8 consideration the effect of the Proposed Lines on the environment, as well as, cultural, land
9 use and scenic resources. The Study results indicate the Proposed Lines would not have a
10 significant impact on the environment. The Study also states that impact on cultural, land
11 use and scenic resources are also minimized by the proposed routes.

12 As part of the review of the Company’s application, ORS conducted discussions
13 with the South Carolina Department of Health and Environmental Control (“DHEC”) and
14 the South Carolina Department of Natural Resources (“DNR”). During these discussions,
15 both DHEC and DNR stated the Company had historically followed all appropriate laws,
16 rules, regulations, and statutes regarding the siting and construction of power lines. From
17 its review and discussions with DHEC and DNR, ORS concluded that the Study adequately
18 addresses the environmental impacts of the Proposed Lines.

19 **Q. HOW WILL THE PROPOSED LINES SERVE THE INTEREST OF SYSTEM**
20 **ECONOMY AND RELIABILITY?**

21 **A.** The Company indicates in its Application, as well as in testimony, the Proposed
22 Lines are the most cost effective manner to serve the system and minimize the impacts to
23 the environment, land use, cultural resources, and aesthetics. ORS concluded that the

1 Proposed Lines will be designed to NERC standards and will enhance the reliability of
2 SCE&G's system.

3 **Q. DOES THE COMPANY PROVIDE REASONABLE ASSURANCE THE**
4 **PROPOSED FACILITIES WILL CONFORM TO APPLICABLE STATE AND**
5 **LOCAL LAWS AND REGULATIONS?**

6 **A.** Yes. In the Application and testimony, the Company affirms it will conform to all
7 applicable state and local laws and regulations as they pertain to the proposed transmission
8 lines and associated facilities.

9 **Q. WERE ANY COMMENTS FILED IN THIS DOCKET PERTAINING TO THE**
10 **COMPANY'S REQUEST FOR A CERTIFICATE FOR THE TRANSMISSION**
11 **LINES?**

12 **A.** Yes. On July 27, 2017, DNR filed a review letter with its comments on the project.
13 These comments stated that DNR had reviewed the Company's Transmission Line Siting
14 and Environmental Report regarding the Proposed Lines.

15 On August 22, 2017, ORS received a letter, subsequently filed with the
16 Commission on August 29, 2017, from the South Carolina Department of Parks, Recreation
17 and Tourism ("PRT") advising that it had no comments or concerns pertinent to the
18 Company's Application.

19 DHEC filed a review letter, dated September 1, 2017, stating that while it did not
20 have any comments related to the Proposed Lines, DHEC reserves its rights as to reviewing
21 any future proceedings before the Commission or reviewing any relevant applications for
22 permits or other approvals.

Q. HAS THE COMPANY SECURED THE NECESSARY RIGHTS-OF-WAY ALONG THE TRANSMISSION LINE ROUTES?

A. Yes. The majority of the Graniteville #2-South Augusta 230 kV Tie Line, approximately 17.64 of the 18.1 miles, will be built on existing Company ROW. The remaining 0.46 miles is to be built on newly established ROW located on property within the Company's Urquhart Generating Station Site. The Urquhart-Graniteville 230 kV Line will be built on existing Company ROW.

Q. HOW WILL THIS PROJECT AID IN ECONOMIC DEVELOPMENT AND ATTRACTION AND RETENTION OF JOBS IN SOUTH CAROLINA?

A. The construction of the Proposed Lines and associated facilities will enhance the reliability of the electrical system in growing areas of the Company's service territory, and will provide for the safe and economical transfer of electricity to load centers. The result will be a stable supply and reliable delivery of power, which promotes economic development.

Q. WILL PUBLIC CONVENIENCE AND NECESSITY BE SERVED BY THE TRANSMISSION LINES PROPOSED IN THE APPLICATION?

A. Yes. ORS's review concluded that the Proposed Lines and associated facilities will result in minimal impact to the environment and will serve the interests of system economy and reliability. The Proposed Lines and associated facilities will support the Company in providing reliable electric service to its customers in the Company's Southwest service territory.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.